

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

-v.-

\$97.18 IN UNITED STATES CURRENCY
FORMERLY CONTAINED IN CHASE BANK
ACCOUNT 932729168, HELD IN THE NAME
OF "SEFIRA TYSONS MANAGER, LLC;"

\$380.00 IN UNITED STATES CURRENCY
FORMERLY CONTAINED IN CHASE BANK
ACCOUNT 932705036, HELD IN THE NAME
OF "SEFIRA TYSONS U.S. HOLDING, INC.;"

\$320,823.20 IN UNITED STATES CURRENCY
FORMERLY CONTAINED IN CHASE BANK
ACCOUNT 932735991, HELD IN THE NAME
OF "SEFIRA TYSONS OWNER, LP;"

\$2.00 IN UNITED STATES CURRENCY
FORMER CONTAINED IN CHASE BANK
ACCOUNT 293919392, HELD IN THE NAME
OF "SEFIRA IVY MANAGER, LLC;"

\$23,686.00 IN UNITED STATES CURRENCY
FORMERLY CONTAINED IN CHASE BANK
ACCOUNT 293916521, HELD IN THE NAME
OF "SEFIRA IVY OWNER, LP;"

\$13.01 IN UNITED STATES CURRENCY
FORMERLY CONTAINED IN CHASE BANK
ACCOUNT 317381827, HELD IN THE NAME
OF "SEFIRA EAGLE MANAGER, LLC;"

\$511,234.82 IN UNITED STATES CURRENCY

DECLARATION OF
ASSISTANT UNITED STATES
ATTORNEY ALINE FLODR

21 Civ. 169 (ALC)

FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 317505912, HELD IN THE NAME :
OF "SEFIRA EAGLE OWNER, LP;" :

\$8,642,406.99 IN UNITED STATES :
CURRENCY FORMERLY CONTAINED IN :
CHASE BANK ACCOUNT 317399811, HELD :
IN THE NAME OF "SEFIRA LOFTS :
MANAGER, LLC;" :

\$8,692,483.00 IN UNITED STATES :
CURRENCY FORMERLY CONTAINED IN :
CHASE BANK ACCOUNT 362983907, HELD :
IN THE NAME OF "SEFIRA RENAISSANCE :
MANAGER, LLC;" :

\$531,446.30 IN UNITED STATE CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 109716388, HELD IN THE NAME :
OF "SEFIRA TOWN CENTER OWNER, LP;" :

\$181.00 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 932699650, HELD IN THE NAME :
OF "SEFIRA WEBB BRIDGE MANAGER, :
LLC;" :

\$10,849.25 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 935585377, HELD IN THE NAME :
OF "SEFIRA WEBB BRIDGE OWNER, LP;" :

\$8.00 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 215827350, HELD IN THE NAME :
OF "SEFIRA WESTON MANAGER, LLC;" :

\$1.00 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 215832822, HELD IN THE NAME :

OF “SEFIRA WESTON U.S. HOLDING, LLC;” :
: :
\$5,054.75 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 215815355, HELD IN THE NAME :
OF “SEFIRA WESTON OWNER, LP;” :
: :
\$1.00 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 928816565, HELD IN THE NAME :
OF “SEFIRA STONEWALL U.S. HOLDING, :
INC.;” :
: :
\$ 158,824.54 IN UNITED STATES :
CURRENCY FORMERLY CONTAINED IN :
CHASE BANK ACCOUNT 928818298, HELD :
IN THE NAME OF “SEFIRA STONEWALL :
OWNER, LP;” :
: :
\$1,930,697.65 IN UNITED STATES :
CURRENCY FORMERLY CONTAINED IN :
CHASE BANK ACCOUNT 919596713, HELD :
IN THE NAME OF “SEFIRA PEPPER OWNER, :
LP;” :
: :
\$68.00 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 157793552, HELD IN THE NAME :
OF “SEFIRA OZARKS MANAGER, LLC;” :
: :
\$1.00 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 912295172, HELD IN THE NAME :
OF “SEFIRA OZARKS U.S. HOLDING, INC.;” :
: :
\$5,009.48 IN UNITED STATES CURRENCY :
FORMERLY CONTAINED IN CHASE BANK :
ACCOUNT 912301871, HELD IN THE NAME :
OF “SEFIRA OZARKS OWNER, LP;” :
: :

\$60.00 IN UNITED STATES CURRENCY :
 FORMERLY CONTAINED IN CHASE BANK :
 ACCOUNT 131768852, HELD IN THE NAME :
 OF "SEFIRA COURTHOUSE MANAGER, :
 LLC;" :

\$5,475.43 IN UNITED STATES CURRENCY :
 FORMERLY CONTAINED IN CHASE BANK :
 ACCOUNT 133881729, HELD IN THE NAME :
 OF "SEFIRA COURTHOUSE OWNER, LP;" :

\$0.11 IN UNITED STATES CURRENCY :
 FORMERLY CONTAINED IN CHASE BANK :
 ACCOUNT 828529375, HELD IN THE NAME :
 OF "SEFIRA COCOA BEACH U.S. HOLDING, :
 INC.;" :

\$823,965.83 IN UNITED STATES CURRENCY :
 FORMERLY CONTAINED IN CHASE BANK :
 ACCOUNT 828500202, HELD IN THE NAME :
 OF "SEFIRA COCOA BEACH OWNER, LP;" :

\$18,966.72 IN UNITED STATES CURRENCY :
 FORMERLY CONTAINED IN CHASE BANK :
 ACCOUNT 851585039, HELD IN THE NAME :
 OF "SEFIRA CYPRESS U.S., LLC;" :

\$796,198.00 IN UNITED STATES CURRENCY :
 FORMERLY CONTAINED IN CHASE BANK :
 ACCOUNT 851553102, HELD IN THE NAME :
 OF "SEFIRA CYPRESS U.S. HOLDING, INC.;" :

\$2,720.65 IN UNITED STATES CURRENCY :
 FORMERLY CONTAINED IN CHASE BANK :
 ACCOUNT 870781510, HELD IN THE NAME :
 OF "SEFIRA ACQUISITIONS, LLC;" :

ALL RIGHT, TITLE AND INTEREST OF :
 SEFIRA TYSONS OWNER, LP, HELD :
 DIRECTLY OR INDIRECTLY, IN THE REAL :
 PROPERTY AND APPURTENANCES :

LOCATED AT 7801 LEESBURG PIKE, FALLS :
 CHURCH, VIRGINIA, KNOWN AS “WESTIN :
 TYSONS CORNER HOTEL,” WITH ALL :
 IMPROVEMENTS AND ATTACHMENTS :
 THEREON; :

ALL RIGHT TITLE AND INTEREST OF :
 SEFIRA IVY OWNER, LP, HELD DIRECTLY :
 OR INDIRECTLY, IN THE REAL PROPERTY :
 AND APPURTENANCES LOCATED AT 625 :
 PIEDMONT AVENUE NE, ATLANTA, :
 GEORGIA, KNOWN AS “IVY HALL :
 APARTMENTS,” WITH ALL :
 IMPROVEMENTS AND ATTACHMENTS :
 THEREON; AND :

ALL RIGHT TITLE AND INTEREST OF :
 SEFIRA EAGLE OWNER, LP, HELD :
 DIRECTLY OR INDIRECTLY, IN THE REAL :
 PROPERTY AND APPURTENANCES :
 LOCATED AT 100 MALAGA WAY (1200 :
 ACADEMIC PARKWAY), LOCUST GROVE, :
 GEORGIA, KNOWN AS “EAGLE’S BROOKE :
 APARTMENTS,” WITH ALL :
 IMPROVEMENTS AND ATTACHMENTS :
 THEREON, :

Defendants-*in-rem*.

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STATE OF NEW YORK)
 COUNTY OF NEW YORK : ss.:
 SOUTHERN DISTRICT OF NEW YORK)

ALINE FLODR, under penalty of perjury, declares:

1. I am an Assistant United States Attorney in the Office of Audrey Strauss, United States Attorney for the Southern District of New York, attorney for plaintiff herein. I have responsibility for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this case. This Declaration is submitted in support of the Government’s

application for a Judgment of Forfeiture with respect to the above-captioned Defendants-*in-rem* United States currency and Defendants-*in-rem* real property interests (collectively, the “Defendants-*in-rem*”).

2. On January 8, 2021, the United States commenced an *in-rem* forfeiture action seeking the forfeiture of the Defendants-*in-rem*, by the filing of a Verified Complaint for Forfeiture (the “Verified Complaint”). The Verified Complaint alleged that the Defendants-*in-rem* are subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(A) and Title 21, United States Code, Section 881.

3. Beginning on or about January 15, 2021, and continuing through February 14, 2021, the Government published notice of the Verified Complaint for Forfeiture against the Defendants-*in-rem* United States currency on the official government internet site, www.forfeiture.gov, for at least 30 consecutive days, and proof of such publication was filed with the Clerk of this Court on March 24, 2021 (D.E. 7).

4. Beginning on or about January 21, 2021, and continuing through February 19, 2021, the Government published notice of the Verified Complaint for Forfeiture against the Defendants-*in-rem* real property interests on the official government internet site, www.forfeiture.gov, for at least 30 consecutive days, and proof of such publication was filed with the Clerk of this Court on March 24, 2021 (D.E. 6).

5. As set forth in Rule G(4)(a)(ii) and Rule G(5)(a)(ii), the notices of forfeiture specified the Defendants-*in-rem* and the intent of the United States to forfeit and dispose of the Defendants-*in-rem*, thereby notifying all third parties of their right to file a claim to adjudicate the validity of their alleged legal interest in the Defendants-*in-rem*, within sixty days from the first day of publication of the Notice on the official government internet site.

6. No claims or answers have been filed or made in this action and no other

parties have appeared to contest the action, and the requisite time periods in which to do so, as set forth in Title 18, United States Code, Section 983(a)(4)(A) and Rule G of the Supplement Rules for Admiralty or Maritime Claims and Asset Forfeiture Claims, have expired.

7. The United States and the Sefira Entities entered into a Stipulation and Order of Settlement, entered by this Court on January 13, 2021 (D.E. 5), wherein the Sefira Entities agreed to pay to the United States \$6,519,345.09 in United States currency in lieu of forfeiture of the Defendants-*in-rem* real property interests (the “Real Estate Payment”).

8. The Sefira Entities have so made the Real Estate Payment to the United States via wire transfer to the United States Marshals Service, and such payment is currently held in the Seized Asset Fund pending entry of a final Judgment of Forfeiture.

9. Accordingly, the Government respectfully requests that the Court enter the attached proposed Judgment of Forfeiture, attached hereto as Exhibit A.

10. There has been no prior application for the relief sought herein. I declare the foregoing to be true and correct pursuant to Title 28, United States Code, Section 1746.

Dated: New York, New York
March 25, 2021



ALINE FLODR
Assistant United States Attorney